



CHILD PROTECTION POLICY

Meridaunia – GAL Meridaunia, as a Local Action Group and consortium of municipalities, associations, and private stakeholders in the Monti Dauni area of Apulia, has always placed community well-being, social inclusion, and sustainable rural development at the centre of its mission. Within this framework, we recognise that children and young people are among the most vulnerable members of our communities, and their safety, rights, and holistic development must be safeguarded in every activity we undertake. This Child Protection Policy (CPP) sets out our clear and binding commitment to ensuring that all children who interact directly or indirectly with Meridaunia's programmes are protected from harm, abuse, neglect, and exploitation. It reflects both our ethical responsibility and our legal duty under Italian law, the United Nations Convention on the Rights of the Child, and European Union safeguarding standards. The policy is not a formality but a living document: it guides how we design, implement, monitor, and evaluate our projects, ensuring that children's best interests remain a primary consideration in rural development, cultural heritage promotion, education, and community empowerment activities.

SCOPE OF APPLICATION

This Child Protection Policy applies to all individuals and entities associated with Meridaunia, irrespective of the nature, duration, or form of their engagement. It is binding upon permanent employees as well as fixed-term and temporary staff, volunteers, interns, and trainees. It also extends to external contractors, consultants, and service providers engaged in activities under the responsibility of Meridaunia. Members of the Board of Directors and management staff are equally subject to this policy, bearing a particular duty to lead by example in ensuring accountability and compliance with child safeguarding standards. The policy is further applicable to partners, affiliated organisations, and stakeholders whenever they operate under agreements, joint projects, or collaborative initiatives with Meridaunia. By entering into cooperation with our organisation, such entities accept the obligation to uphold the same safeguarding standards and to demonstrate that their internal practices are consistent with the principles outlined in this document. The scope of this policy encompasses the entirety of Meridaunia's organisational actions, whether or not children are direct participants in its initiatives. It covers the design, implementation, monitoring, and evaluation of projects and programmes, the organisation of training sessions and workshops, and the facilitation of community events and cultural activities. Particular attention is required in contexts such as educational initiatives carried out in schools or youth centres, heritage promotion projects involving intergenerational participation, entrepreneurship programmes that engage young people in agriculture or sustainable tourism, and local fairs, festivals, or gastronomic events where children are present with their families or as students. Furthermore, this policy applies to all communication and digital engagement, including the publication of materials on Meridaunia's website and social media platforms, where children may be represented in photographs, videos, or testimonials.



GUIDING PRINCIPLES

Meridaunia's Child Protection Policy is grounded in internationally recognised standards and legal obligations. At its core lies the acknowledgment that every child is a rights-holder under the United Nations Convention on the Rights of the Child (UNCRC), ratified by Italy in 1991, and protected by the EU Charter of Fundamental Rights, which affirms the right of children to protection and care necessary for their well-being. In addition, Meridaunia aligns with Italian national legislation on child safeguarding, data protection, and the prevention of abuse and exploitation.

The first guiding principle is the right to protection. Every child, without exception, has the right to live free from abuse, exploitation, neglect, and violence. This right is absolute and cannot be overridden by cultural, economic, or organisational considerations. All Meridaunia activities are designed and implemented in ways that actively reduce risks and reinforce protective environments.

The second principle is zero tolerance. Meridaunia categorically prohibits all forms of child abuse, whether physical, sexual, emotional, psychological, or digital. No level of harm is acceptable. Allegations or suspicions of abuse will trigger immediate and appropriate action, including disciplinary measures, referral to law enforcement, and engagement with the Italian child protection system.

The third principle is the best interest of the child, which serves as a primary consideration in every decision taken by the organisation. Whether in programme design, event management, or partnership agreements, the welfare and holistic development of children take precedence over financial, administrative, or reputational interests. This principle reflects both Article 3 of the UNCRC and the broader European and Italian legal frameworks on child welfare.

Meridaunia also upholds the principle of participation and dignity. Children are not passive recipients of protection but active agents with the right to express their views on matters that affect them. Their perspectives must be taken seriously, and their involvement must occur in conditions that are safe, inclusive, and respectful. In line with Articles 12 and 13 of the UNCRC, Meridaunia ensures that children's voices are heard, free from discrimination, and that their dignity is safeguarded at all times.

Finally, the principle of shared responsibility underpins this policy. Safeguarding is not the duty of a single person or department but a collective obligation that binds all individuals associated with Meridaunia—employees, volunteers, interns, contractors, consultants, board members, and partners alike. Each person has a duty of vigilance and accountability, ensuring that safeguarding becomes part of the organisational culture and is embedded in every action, both within the Monti Dauni territory and across international projects.



RISKS IN MERIDAUNIA'S CONTEXT

As an organisation deeply rooted in the Monti Dauni area and engaged in EU-funded projects, cultural events, educational initiatives, and community development programmes, Meridaunia recognises that its work may create situations in which children could be exposed to specific safeguarding risks. These risks must be understood not only in abstract terms but also in relation to the distinctive characteristics of rural communities, where close social ties, limited institutional resources, and the frequent overlap between personal and professional relationships can both support and challenge effective child protection.

One important area of risk concerns the behaviour of adults in positions of trust. During workshops, training sessions, or cultural events organised or supported by Meridaunia, there exists the possibility that individuals could misuse their authority, act inappropriately, or cross professional boundaries. While such cases are rare, they must be anticipated and prevented through robust codes of conduct and continuous oversight.

Another risk arises from the potential neglect of children's needs in community-based or family-oriented activities. In small rural communities, events are often intergenerational, and activities may be primarily designed with adults in mind, inadvertently overlooking the specific safety, inclusion, and participation requirements of children. Without deliberate attention, children can become invisible in planning, leading to situations where their protection is insufficiently guaranteed.

The digital dimension of Meridaunia's work introduces further risks. The use of social media, websites, and online platforms to promote cultural heritage, tourism, and educational content sometimes involves the collection and dissemination of children's images, voices, or personal data. Without clear consent procedures and safeguards, these materials could be misused or circulated beyond the intended audience, exposing children to harm.

STANDARDS OF BEHAVIOUR

Meridaunia requires all individuals associated with the organisation—whether employees, volunteers, consultants, or partners—to adhere to the highest standards of conduct when interacting with children. Interactions must always be professional, transparent, and respectful, ensuring that no situation can be misinterpreted or exploited. Any form of physical punishment, humiliation, degrading treatment, or verbal abuse is strictly forbidden and will be considered a grave breach of duty. Under no circumstances may staff, volunteers, or partners develop private, secretive, or exploitative relationships with children. Professional boundaries must be maintained at all times, and behaviour that could create perceptions of favouritism, dependency, or grooming is unacceptable. In relation to communication and the use of digital tools, photographs, video recordings, interviews, or any form of personal data involving children may only be collected with the informed consent of parents or legal guardians. Such materials must be handled with the utmost care, stored securely, and disseminated only within the limits expressly authorised, with safeguards in place to prevent misuse or unauthorised circulation. Furthermore, Meridaunia is committed to ensuring the



constant supervision of children during any activity it organises or coordinates. At no time shall a child be left unattended or placed in a situation where their safety or well-being could be compromised. Any violation of these standards will be treated as serious misconduct. Depending on the gravity of the breach, consequences may include disciplinary action, suspension or dismissal, termination of partnership agreements, and, where relevant, immediate referral to national child protection services and law enforcement authorities. These rules are binding and non-negotiable, forming the foundation of Meridaunia's safeguarding culture.

RECRUITMENT AND HUMAN RESOURCES

Meridaunia recognises that effective safeguarding begins with the careful selection and management of the people it engages. Recruitment is therefore carried out with a deliberate focus on child protection, ensuring that only individuals who demonstrate integrity, responsibility, and commitment to safeguarding are entrusted with roles that may bring them into contact with children.

All recruitment and engagement processes are conducted with rigour. The identity and professional references of every applicant—whether staff member, volunteer, or contractor—are systematically verified before any appointment is confirmed. For all positions that involve direct or indirect work with children, criminal background checks are mandatory, in full compliance with Italian legislation and European standards. No individual may be assigned to duties involving children without a clear record and explicit authorisation.

As part of their contractual obligations, all employees, volunteers, and contractors are required to sign a safeguarding and child protection declaration, confirming their understanding of this policy and their personal commitment to upholding it. Safeguarding responsibilities are explicitly integrated into job descriptions, terms of reference, and partnership agreements, ensuring that accountability is clear from the outset. Furthermore, adherence to child protection standards forms part of performance evaluations and professional assessments, reinforcing the expectation that safeguarding is not an optional consideration but an essential dimension of all roles.

TRAINING AND CAPACITY BUILDING

Meridaunia recognises that safeguarding policies are effective only when supported by knowledge, skills, and a shared culture of responsibility. For this reason, training and capacity building are mandatory components of our safeguarding framework and apply to all individuals associated with the organisation. Every staff member, volunteer, and partner is required to participate in an induction programme on child safeguarding upon joining the organisation. This training introduces the principles of child protection, outlines the standards of behaviour expected, and explains the procedures for recognising, preventing, and reporting risks. It ensures that all individuals begin their engagement with Meridaunia fully aware of their obligations and the consequences of non-compliance. To maintain high standards of practice and ensure alignment with evolving legal frameworks and professional guidance, Meridaunia provides refresher training at regular intervals. At a minimum, such training occurs every two years and covers updates in Italian and European legislation, developments in international best practice, and lessons learned from case management and reporting within the organisation. In addition to general training, Meridaunia delivers specialised



workshops tailored to those with direct responsibility for activities involving children, including project coordinators, facilitators, and frontline staff. These workshops address practical safeguarding challenges, scenario-based learning, and advanced reporting procedures, ensuring that those in positions of trust are equipped to act promptly and effectively in the best interest of the child.

DATA PROTECTION

Meridaunia is fully committed to protecting the personal data and privacy of children in line with the EU General Data Protection Regulation (GDPR), Italian national legislation, and the highest ethical standards. Safeguarding children includes safeguarding their personal information, and for this reason, strict procedures govern every stage of data collection, storage, and use within the organisation.

Data relating to children will only be collected when it is strictly necessary and always with the explicit, informed consent of parents or legal guardians. Consent must be documented in writing and must specify the purposes for which the data is being gathered. At no time will the absence of consent be bypassed or substituted with implied approval.

All personal data is stored securely, using both digital and physical safeguards, and access is restricted to authorised staff members who require the information for legitimate organisational purposes. Security measures are regularly reviewed to ensure that systems remain robust and resistant to misuse, loss, or unauthorised access.

The use of children's data is limited exclusively to the purposes for which consent has been obtained, and under no circumstances will such data be shared with third parties for purposes outside the scope of Meridaunia's projects. In particular, personal data will never be used for commercial gain, political activity, or any non-project-related objective. When data is no longer required, it will be deleted or anonymised in accordance with GDPR retention rules.

Meridaunia also recognises that images, recordings, or testimonies involving children constitute personal data and therefore require the same level of protection. Any use of such material in reports, communications, or promotional activities must be expressly authorised by parents or guardians, and safeguards will be applied to prevent misuse, overexposure, or dissemination beyond the intended audience.

In addition to these organisational responsibilities, Meridaunia affirms the rights of children under the GDPR. Children, through their parents or legal guardians, have the right to access the personal data held about them, to request corrections of inaccurate or incomplete information, and to request the erasure of their data when it is no longer necessary or when consent has been withdrawn. They also retain the right to restrict or object to the processing of their data, and to receive clear information about how their personal information is used. Meridaunia ensures that such requests are addressed promptly and in accordance with legal obligations.

REPORTING AND RESPONSE PROCEDURES



Meridaunia has established a clear and mandatory chain of responsibility for the reporting and management of all child protection concerns. Safeguarding is a collective duty, and no suspicion or disclosure of abuse, neglect, or exploitation may be ignored or dismissed.

Any staff member, volunteer, or partner who becomes aware of, or suspects, a safeguarding risk must immediately report the matter to the designated Child Protection Officer (CPO). Reports must be documented using the official safeguarding incident form, ensuring that all relevant details are recorded accurately and securely. The CPO has the responsibility to acknowledge the report, assess its credibility, and determine the appropriate course of action. Confidentiality is to be strictly maintained throughout the process, with information shared only with those who have a legitimate role in the safeguarding response.

Where concerns are substantiated or deemed serious, the CPO must escalate the case without delay to the competent child protection authorities, including national child protection services, social authorities, or law enforcement agencies, in accordance with Italian legislation and European standards. Meridaunia recognises that its role is not to investigate allegations but to ensure that concerns are referred promptly to the bodies legally mandated to protect children.

In emergency situations where a child is believed to be in immediate danger, any staff member has the duty to bypass internal procedures and contact the appropriate authorities directly, notifying the CPO as soon as possible thereafter. This ensures that urgent risks are never delayed by procedural barriers.

Meridaunia guarantees that all reports will be treated with seriousness, urgency, and professionalism. Each case will be fully documented and securely stored, with follow-up actions monitored until the matter is resolved. Retaliation, intimidation, or discrimination against whistle-blowers is strictly prohibited and will be treated as misconduct. The organisation affirms that safeguarding is most effective when individuals feel confident and protected in raising concerns.

EXTERNAL REFERRAL AND COOPERATION

Meridaunia recognises that safeguarding children requires close coordination with the wider protection system established under Italian law and supported by European frameworks. The organisation therefore works in partnership with the competent child protection authorities, including municipal and regional social services, law enforcement agencies, judicial bodies, health services, and specialised non-governmental organisations.

Whenever concerns arise that exceed the scope of the organisation's direct capacity or authority, Meridaunia has a duty to ensure that cases are referred promptly, responsibly, and in full compliance with established procedures. Such referrals are made without delay, in order to guarantee the safety of the child and to activate the statutory protection mechanisms that only public authorities can provide.

Meridaunia emphasises that its role is not to investigate allegations or to determine the veracity of concerns raised. Rather, its responsibility is to identify potential risks, document and report them, and cooperate fully with the competent authorities in their assessment and response. This includes providing accurate records of disclosures, facilitating access to relevant project staff or environments, and maintaining the confidentiality and dignity of the child throughout the process.



COMPLAINTS MECHANISM

Meridaunia is committed to ensuring that all children, families, staff members, and community stakeholders have access to a safe, transparent, and reliable mechanism for raising concerns about child protection. Any individual who believes that a child has not been adequately safeguarded in the context of Meridaunia's activities has the right to lodge a complaint without fear of retaliation, discrimination, or prejudice.

Complaints may be submitted directly to the Child Protection Officer (CPO), either in person, by telephone, or via a dedicated safeguarding email address ([to be inserted]). In order to ensure accessibility for those who may prefer anonymity, a confidential complaints box is also available at Meridaunia's headquarters, with regular monitoring by the CPO.

All complaints are formally acknowledged within seven days of receipt. Once registered, they are subject to an impartial investigation process, led by the CPO in consultation with senior management and, where necessary, with external safeguarding experts or relevant authorities. Every effort is made to resolve complaints swiftly, transparently, and in a manner that respects the dignity and privacy of the child involved. Meridaunia guarantees that no individual who raises a concern in good faith will face reprisals or negative consequences. On the contrary, whistle-blowers and complainants are considered vital contributors to safeguarding, and their cooperation is treated with respect and confidentiality.

POLICY REVIEW AND ACCOUNTABILITY

This Child Protection Policy is a living document that evolves with the organisation and the communities it serves. To ensure its continued relevance and effectiveness, the policy will be formally reviewed at least once every two years. Reviews may also be initiated earlier whenever circumstances require, such as changes in Italian or European legislation, significant developments in Meridaunia's organisational activities, or the occurrence of a reported safeguarding incident.

The review process is led by the Child Protection Officer (CPO), who works in close consultation with the management team, staff representatives, and, where appropriate, external safeguarding experts or child protection authorities. The outcomes of each review are documented and approved by the Board of Meridaunia, with revisions disseminated promptly to all staff, volunteers, and partners. Compliance with the most recent version of the policy is mandatory for all individuals associated with the organisation.

Accountability for implementation rests with every member of the organisation. The Board and management ensure oversight, the CPO provides technical leadership and monitoring, and staff, volunteers, and partners are required to integrate safeguarding practices into their daily work. Failure to comply with this policy constitutes misconduct and may lead to disciplinary action, termination of engagement, and, where applicable, referral to law enforcement authorities.



PUBLIC COMMITMENT

This document represents Meridaunia's public commitment to safeguarding children. It is both a declaration of organisational values and a binding framework for action. To guarantee transparency, the full version of this Child Protection Policy will be published on the organisation's official website at <https://www.meridaunia.it>, where it will be freely accessible to staff, beneficiaries, partners, community members, and the general public. Meridaunia believes that openness is central to accountability. By making this policy available online, the organisation ensures that all stakeholders—especially families and children—are aware of their rights and of the standards that Meridaunia has pledged to uphold.

APPROVAL

This Child Protection Policy has been formally reviewed and adopted by the Board of Directors of Meridaunia and signed by its Legal Representative. It enters into force immediately upon signature and is binding on all individuals engaged with the organisation, including staff, volunteers, contractors, and partners. Compliance is a mandatory condition of employment, collaboration, or partnership with Meridaunia.

Signed: Pasquale De Vita, President

MERIDAUNIA Soc. Cons. a r.l.

Date: 1/09/2025
Piazza Municipio n. 2
71023 BOVINO (FG)
P. IVA: 02303810713